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*Lead Counsel for the Indirect-Purchaser Plaintiffs*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 3:07-cv-5944 SC

MDL No. 1917

This Document Relates to:

Indirect-Purchaser Class Action

*Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.*, No. 13-cv-1173;

*Sharp Elecs. Corp. v. Koninklijke Philips Elecs. N.V.*, No. 13-cv-02776;

*Siegel v. Hitachi, Ltd.*, No. 11-cv-05502;

*Siegel v. Technicolor SA, et al.*, No. 13-cv-05261;

*Best Buy Co., et al. v. Hitachi, Ltd., et al.*, No. 11-cv-05513;

*Best Buy Co., et al. v. Technicolor SA, et al.*, No. 13-cv-05264;

*Target Corp. v. Chunghwa Picture Tubes, Ltd., et al.*, No. 11-cv-05514;

*Target Corp. v. Technicolor SA, et al.*, No. 13-cv-05686;

*Sears, Roebuck and Co. and Kmart Corp. v.*

**DECLARATION OF GERARD A. DEVER  
IN SUPPORT OF INDIRECT  
PURCHASER PLAINTIFFS'  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENT UNDER SEAL**

1 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv- )  
05514; )  
2 )  
3 *Sears, Roebuck and Co. and Kmart Corp. v.* )  
*Technicolor SA*, No. 13-cv-05262; )  
4 *Viewsonic Corp. v. Chunghwa Picture Tubes,* )  
*Ltd.* No. 14-cv-02510. )  
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1 I, GERARD A. DEVER, declare as follows:

2 1. I am a member of the law firm of Fine, Kaplan and Black, R.P.C., counsel for the  
3 Indirect Purchaser Plaintiffs in the above-captioned action currently pending in the U.S. District  
4 Court for the Northern District of California. I submit this Declaration in support of Indirect  
5 Purchaser Plaintiffs' Administrative Motion to File Documents Under Seal, relating to Indirect  
6 Purchaser Plaintiffs' Response to Defendants' *In Limine* No. 8 to Exclude Evidence and Argument  
7 Relating to Damages from "Spillover" or "Ripple" Effects of Foreign Price-Fixing Activities on  
8 U.S. Prices ("IPPs' Response to Defendants' MIL No. 8").

9 2. I am a member in good standing of the bar of the Commonwealth of Pennsylvania,  
10 and I am admitted *pro hac vice* to practice before this Court.

11 3. Pursuant to Civil Local Rules 7-11 and 79-5, and in accordance with this Court's  
12 General Order No. 62, effective May 10, 2010, IPPs, by and through their counsel, respectfully  
13 request an Order permitting filing under seal their response to Defendants' Motion *In Limine* No. 8  
14 to Exclude Evidence and Argument Relating to Damages from "Spillover" or "Ripple" Effects of  
15 Foreign Price-Fixing Activities on U.S. Prices.

16 4. IPPs' Response refers to or contains excerpts from defendants' sealed exhibits.  
17 These references or excerpts are identified in the Response with yellow highlighting. An  
18 unredacted copy of the Motion with yellow highlighting is being submitted to Chambers.

19 I declare under penalty of perjury under the laws of the United States that the foregoing is  
20 true and correct.

21 Executed on February 27, 2015, in Philadelphia, Pennsylvania.

22 /s/ Gerard A. Dever

23 Gerard A. Dever  
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